

# Superfund Division Director Meeting Background

**Meeting Title:** Vogel Paint & Wax Superfund Site

**Meeting Date/Time:**

**Point-of-Contact:**

## Meeting Purpose

[Provide a short summary of the purpose of the meeting and the significant aspects of the topic/issue to be discussed]

A BTEX groundwater plume under OU2 has migrated off-site. The PRP proposes to implement a bioremediation pilot study to stabilize the on-site plume, control off-site migration, and control the secondary source area. The current pump & treat (P&T) remedy, which has been operating with some shut-down periods, would need to be shut-off during implementation of the pilot study. The PRP's contention, supported by IDNR, is that this remedial activity does not need to be documented through a ROD Amendment or ESD. The PRP and IDNR would like to then maintain, rather than operate, the P&T remedy. IDNR also recommends performing sampling once prior to every Five-Year Review to verify site conditions are stable.

## Background

[Provide a short summary of past and/or current events and stakeholder involvement for context. Supplemental information can be attached.]

The site was listed on NPL in June 1986, and EPA delegated the site lead responsibilities to IDNR. The COCs are BTEX and metals. The metals contamination in soils has been addressed under OU1. The off-site plume addressed under OU2 shows one well exceeding MCL only for Ethylbenzene. There are no current human or environmental exposures, and the site has ICs to prohibit installation of drinking water wells or for other unsafe use and to prohibit excavation in the area where soils containing high level metals were placed.

The proposed pilot study would continue until the P&T shutoff criteria in the 2000 ESD are met, namely: 1) Stabilize the groundwater plume; 2) Control off-site migration above MCLs; 3) Remediate the offsite migrated plume above MCLs; 4) Eliminate data gaps on the north end of the site; and 5) Prevent future exposure to human health and environment.

## Upcoming Actions & Next Steps

[Identify key upcoming actions and/or decisions needed from SUPR leadership or others.]

Region 7 informed the PRP and IDNR that it supports the PRP's proposal to implement the bioremediation pilot study, and the PRP is proceeding with its implementation. However, Region 7 has expressed that it believes implementation of bioremediation to achieve cleanup goals constitutes a fundamental change to the remedy selected in the ROD, which must be documented in a ROD amendment. Several action items resulted from a meeting with the PRP and IDNR in Dec. 2018:

1. EPA needs to communicate a final position regarding the need for documenting a change to the ROD-selected remedy.
2. The PRP has proposed site deletion from NPL after the P&T shut-down conditions are met.
3. The PRP has proposed site closure with P&T being maintained, rather than operated. The PRP has identified Superfund Task Force recommendation #2 to support their case.

## Other Issues or Sensitive Topics

[List any other key issues or sensitive aspects of the meeting topic for Division Director awareness]

1. IDNR is the lead agency for oversight. The EPA Region 7 has an MOA with IDNR delegating these responsibilities.
2. IDNR has the Consent Order with the PRP. EPA has no enforcement relation with the PRP due to the MOA.
3. The site team supports implementation of the pilot study thereby leading to a potential cost-effective cleanup strategy, as well as, potentially reduced cleanup time frame.